

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 1:23-cr-153

Plaintiff,

v.

Hon. Hala Y. Jarbou
Chief U.S. District Judge

QUENTIN EARL BOOTH,

Defendant.

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GOVERNMENT'S SENTENCING MEMORANDUM

On September 9, 2023, Defendant, a three-time convicted felon, walked into a Lansing, Michigan, convenience store with a pistol. One of his associates was carrying an assault rifle. When police responded, Defendant tried hiding the guns. The entire incident was captured on surveillance video. Defendant has a history of domestic violence, assault, and improper weapon possession. Based on Defendant's extensive criminal history and his utter disregard for the law, the government requests the Court fashion a sentence that reflects the threat Defendant poses.

Factual Background

On September 9, 2023, police responded to a Save-On Market in Lansing, Michigan, after an individual holding an assault rifle walked into the store and said, "[E]very body is going to die." (R.33: PSR, PageID.109, ¶ 9.) Police arrived and saw Defendant holding the assault rifle. (*Id.* at PageID.110, ¶ 10.) Defendant then placed the rifle through the front passenger window of his girlfriend's car. (*Id.*) Defendant also had

a pistol in his right pocket that he covertly placed into the front passenger window. (*Id.* at PageID.111, ¶ 16.) The recovered guns were a Smith & Wesson M&P 15 5.56 caliber assault rifle and a Taurus G3 9mm pistol. (*Id.*, PageID.110, ¶ 14.) Attached to the rifle was a 30-round magazine loaded with 19 rounds of ammunition. (*Id.*) The pistol had one round in the chamber, and the guns were registered to Defendant's girlfriend. (*Id.*; PageID.127, ¶ 99.)

Defendant's Criminal History

Defendant's criminal history consists of 41 convictions. (*Id.* at PageID.114-125, ¶¶ 41 – 82.) Those convictions include police officer assault, resisting, obstructing; domestic violence; five counts of assault and battery; improper possession of a firearm; attempted armed robbery; and assault with intent to do great bodily harm. (*Id.*) Defendant was also found guilty of 13 misconduct violations while in custody for his attempted armed robbery offense. (*Id.*, PageID.123, ¶ 81.)

Defendant's criminal history category is V. (*Id.*, PageID.125, ¶ 84.)

§ 3553(a) Factors

Every sentencing factor will not necessarily be relevant to each case. Key factors that the United States considers applicable in this case are addressed below.

A. Nature and Circumstances of the Offense and the History and Characteristics of Defendant

Defendant possessed guns inside of the Save-On Market and outside of the store. (PSR, PageID.111, ¶ 16.) Perhaps most concerning is Defendant's willingness to grab the assault rifle and place it in a car after police arrive. (*Id.*, PageID.110, ¶10.) Defendant could have laid the weapon down when he saw police, but he chose not to. Defendant could

have placed his holstered pistol on the ground, but he chose to sneak the gun into the car while two passengers sat in the backseat. (*Id.*) Police found the pistol under the driver's seat with the magazine separated. (*Id.* at ¶ 14.)

Defendant has a two-decade long criminal history. He was given several chances to distance himself from the criminal justice system. Instead, Defendant chose to openly walk around a convenient store with a holstered pistol. He also chose to enter the store despite one of his associates carrying an assault rifle. Based on his criminal history, a significant sentence is necessary to ensure history does not continue to repeat itself.

Conclusion

Defendant has shown disregard for the safety of others and the laws designed to protect the public from firearms. For the reasons set forth above, under § 3553(a), the government requests the Court fashion a sentence that reflects the threat Defendant poses.

Respectfully submitted,

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United States Attorney

Dated: June 11, 2024

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